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**UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF CALIFORNIA  
SAN JOSE DIVISION**

REGENTS OF THE UNIVERSITY OF  
MINNESOTA,

Plaintiff,

v.

LSI CORPORATION and AVAGO  
TECHNOLOGIES U.S. INC.,

Defendants.

Case No.: 5:18-cv-00821-EJD-NMC

**JOINT NEUTRAL STATEMENT OF THE  
CASE**

Pretrial Conference: March 6, 2025  
Time: 2:00 p.m.  
Courtroom: 4

Hon. Edward J. Davila  
Trial Date: March 25, 2025

1 Plaintiff Regents of the University of Minnesota (“UMN”) and Defendants LSI Corporation  
2 and Avago Technologies U.S. Inc. (together, “LSI”) respectfully submit the following agreed-upon  
3 language as a neutral statement of the case:

4 “The plaintiff in this case is Regents of the University of Minnesota, the governing body of  
5 the University of Minnesota, also known as UMN. The defendants in this case are LSI Corporation  
6 and Avago Technologies U.S. Inc., two subsidiaries of Broadcom Inc., that together will be referred  
7 to as LSI. LSI designs and develops read channels, which are incorporated as part of systems-on-a-  
8 chip, also called SoCs, to be used in hard disk drives.

9 UMN owns U.S. Patent No. 5,859,601, which you will hear called the ’601 Patent. UMN  
10 claims that LSI infringed two claims of the ’601 Patent and should pay UMN a reasonable royalty  
11 for that infringement. LSI denies infringement and asserts that both claims of the ’601 Patent are  
12 invalid and unenforceable.”  
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Dated: February 24, 2025

Respectfully submitted,

/s/ Christopher M. Verdini

/s/ Kristopher L. Reed

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**CERTIFICATE OF SERVICE**

I hereby certify that a true and correct copy of the above and foregoing document has been served on all counsel of record via the Court's ECF system on February 24, 2025.

/s/ Christopher M. Verdini  
Christopher M. Verdini